

SPERTUS, LANDES & UMHOFFER, LLP
Matthew Donald Umhofer (SBN 206607)
Elizabeth A. Mitchell (SBN 251139)
617 W. 7th Street, Suite 200
Los Angeles, California 90017
Telephone: (213) 205-6520
Facsimile: (213) 205-6521
mumhofer@spertuslaw.com
emitchell@spertuslaw.com
lenriquez@spertuslaw.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

LA ALLIANCE FOR HUMAN
RIGHTS, an unincorporated
association, JOSEPH BURK,
HARRY TASHDJIAN, KARYN
PINSKY, CHARLES MALOW,
CHARLES VAN SCOY, GEORGE
FREM, GARY WHITTER, and
LEANDRO SUAREZ, individuals,

Plaintiffs,

v.

CITY OF LOS ANGELES, a
municipal entity; COUNTY OF LOS
ANGELES, a municipal entity; and
DOES 1 through 10 inclusive,

Defendants.

Case No. 2:20-cv-02291

(to be related to *Orange County
Catholic Worker et al v. County of
Orange, et al*,
Case No. 18-CV-00155-DOC-JDE)

NOTICE OF RELATED CASE

[C.D. Cal. L.R. 83-1.3]

**TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF
RECORD:**

In accordance with Local Rule 83-1.3, Plaintiffs LA Alliance for Human Rights, an unincorporated association, Joseph Burk, Harry Tashdjian, Karyn Pinsky, Charles Malow, Charles Van Scoy, George Frem, Gary Whitter, and Leandro Suarez (“Plaintiffs”) file the instant Notice of Related Case. This case calls for a determination of the same or substantially identical questions of law

1 and fact and is likely to entail substantial duplication of labor for the judges
2 assigned to each respective case.

3 **I. These Cases Should Be Related Because They Call for a**
4 **Determination of the Same or Substantially Identical Questions of Law**

5 In *Orange County Catholic Worker et al v. County of Orange, et al*, Case
6 No. 18-CV-00155-DOC-JDE, Judge Carter has made specific determinations of
7 law surrounding the issue of sufficiency of shelter needed for those experiencing
8 homelessness, including as required under the Ninth Circuit opinion issued in
9 *Martin v. City of Boise*, 920 F.3d 584 (9th Cir. 2019), *cert. denied*, 140 S. Ct. 674
10 (2019). This case involves substantially the same issue, and plaintiffs anticipate
11 similar or identical legal issues will be submitted to the Court for determination.

12 Additionally, the County of Los Angeles is a defendant in this case, and
13 any legal issues decided herein, or any agreement entered into, would necessarily
14 affect all 88 cities within Los Angeles County because i) the County has a
15 continuing obligation to provide support services to indigent persons including
16 and in particular those experiencing homelessness, and ii) plaintiffs argue for the
17 County's obligation to provide shelter beds in a more comprehensive manner
18 affecting all 88 cities within its jurisdiction. On September 23, 2019, plaintiffs in
19 *Orange County Catholic Worker* filed a motion to file a supplemental complaint
20 against the city of Bellflower [Docket No. 339]; that same day, plaintiffs filed a
21 notice of settlement and settlement agreement with the City of Bellflower
22 [Docket No. 341]. On October 7, 2019 the Court granted plaintiffs' motion to file
23 the supplemental complaint [Docket No. 351] and signed the settlement order
24 [Docket No. 355]. The city of Bellflower is within the County of Los Angeles;
25 therefore, any substantive order or agreement occurring in this case would
26 necessarily affect the city of Bellflower and potentially the settlement reached in
27 the *Orange County Catholic Worker* case. Moreover, upon information and
28 belief, several other cities with the County of Los Angeles are considering a

1 similar path as Bellflower and voluntarily entering into a pre-filing or concurrent-
 2 filing settlement with plaintiffs in *Orange County Catholic Worker*, and this case
 3 would affect those cities and settlements similarly. Finally, the parties in this
 4 case anticipate a potential amended complaint or crossclaim against other cities
 5 within Los Angeles County which could include Bellflower and other cities in
 6 current negotiations.

7 **II. In the Interests of Judicial Economy and Consistency, the Cases**
 8 **Should be Related.**

9 In light of the substantially similar legal issues presented in these cases,
 10 litigating these cases separately would create a substantial duplication of labor if
 11 heard by different judges. Judge Carter, having presided over *Orange County*
 12 *Catholic Worker* and related cases, is already familiar with the law surrounding
 13 these issues. Moreover, having separate judges within the same district deciding
 14 the same issue may result in inconsistent rulings on crucial issues, such as the
 15 sufficiency of number of beds needed to resume enforcement of certain quality of
 16 life laws under *Martin v. City of Boise*, as well as the intricacies involved in
 17 siting constitutionally appropriate shelters for those experiencing homelessness.
 18 Accordingly, relating these two cases is appropriate under Local Rule 83-1.3.1.

19
 20 Dated: March 11, 2020

/s/ Elizabeth A. Mitchell

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